

The Honorable David G. Estudillo

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

WILL CO. LTD. a limited liability company  
organized under the laws of Japan,  
Plaintiff,

vs.

KAM KEUNG FUNG, aka 馮錦強, aka  
FUNG KAM KEUNG, aka FUNG  
KAMKEUNG, aka KUENG FUNG, aka  
KEUNG KAM FUNG, aka KAM-KEUNG  
FUNG, aka KEVIN FUNG, an individual;  
FELLOW SHINE GROUP LIMITED, a foreign  
company, and DOES 1-20, d/b/a AVGLE.COM,

Cause No. 3:20-cv-05666-RSL

AGREED REQUEST TO RENOTE  
PLAINTIFF'S OBJECTIONS TO  
MAGISTRATE'S REPORT AND  
RECOMMENDATIONS

**AGREED REQUEST TO RENOTE OBJECTIONS**

Subject to approval of this Court, Defendants Kam Keung Fung ("Mr. Fung") and Fellow Shine Group Limited ("FSG"), and Plaintiff Will Co. Ltd. hereby agree and request that Plaintiff's Objections To Magistrate's Report and Recommendations (DKT#79) be re-noted from January 13, 2023 to January 23, 2023. The purpose of this request is based on the following:

1. Defendants had previously granted an extension of time for Plaintiff to file its objections to the Magistrate's Report and Recommendations as a courtesy to Plaintiff's counsel (see Dkt. # 77).

1           2.       While agreeing to extend the date for Plaintiff to file its objections, the  
2 extension of time inadvertently failed also to extend the notice date for two weeks as required  
3 by Local Rule 72 and, thus, provided Defendants with only 4 days to respond rather than the  
4 14 days specified by Local Rule 72.

5           3.       The purpose of this extension is to provide Defendants with appropriate time  
6 to respond to Plaintiff's Objections.

7           4.       This request to re-note the motion is made in accordance with such agreement  
8 among Defendants' and Plaintiff's counsel and is not made for purposes of delay or any other  
9 improper purpose.

10           Dated this 11<sup>th</sup> day of January, 2023.

11 Respectfully Submitted:

12  
13 /s/ Philip Mann

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